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Office of Enforcement
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Administrator
Enforcement Division
Department of Environmental Quality
1520 E. Sixth Avenue
P. O. Box 200901
Helena, Montana 59620-0901

October 12, 2009

**DOCKET No.: HW-07-01
EAST HELENA SITE
QUARTERLY PROGRESS REPORT
JULY 2009 - SEPTEMBER 2009**

Dear Administrator:

On October 2, 2007, Asarco and the Montana Department of Environmental Quality (Department) entered into an Administrative Order on Consent, Docket No. HW-07-01 (Order), to continue Asarco's cleaning and demolition program established under the 2005 Consent Decree. The Order requires Asarco to develop and implement yearly work plans for the removal, storage, and proper disposal or recycling of all remaining hazardous waste and/or secondary material located in process units, pollution control devices, and storage units and other identified areas of the East Helena Plant.

On March 13, 2009, Asarco submitted the proposed 2009 Cleaning and Demolition Program and 2009 Interim Measures Work Plan Addendum (Work Plan) to the Department, EPA, and Montana Historic Society. The Work Plan fully described the activities scheduled to be implemented during calendar year 2009 at the East Helena Plant to address obligations under the Order and certain requirements under the RCRA Consent Decree (Decree).

In two April 21, 2009 letters, EPA and the Department conditionally approved the April 2009 Work Plan providing that Asarco 1) increase the collection of duplicate samples in exposed soils sampling areas and 2) conduct additional soils sampling at five locations identified on the modified Sheet 10 in EPA's approval letter. On April 22, 2009, Asarco submitted the revised and final Work Plan to EPA and the Department.

On May 5, 2009, Asarco conducted a mandatory pre-bid walk through for the 2009 Cleaning and Demolition Work. On May 19, 2009, Asarco received bids from nine contractors for completing the 2009 Cleaning and Demolition Program and 2009 Interim

Measures Work Plan Addendum Project. On May 29, 2009, Asarco provided EPA with the results of the contractor evaluation and a recommendation for selecting URS/CWC. On June 1, 2009, Asarco provide EPA with a summary cost table from the nine bidding contractors. On June 1, 2009, EPA, in consultation with the Department advised Asarco to proceed with notifying URS/CWC of the selection, including the proposal to Express Services to complete the tasks outlined in Additive Alternate A.

Section 5.1 of the Work Plan requires Asarco to submit quarterly Work Plan Reports to the Department that discuss the actions taken by Asarco under the Work Plan. The following report describes those activities that have occurred or are related to projects performed under the approved Work Plan from July 2009 through September 2009.

a. A description of the portion of the Work Plan completed;

BUILDINGS AND STRUCTURES SCHEDULED FOR CLEANING

Hydrogen Peroxide Storage Tanks

The cleaning of the hydrogen peroxide storage tanks is complete. On September 30, 2009, Asarco submitted the completion notification letter to the Department.

High Grade Building

The cleaning of the high grade building commenced during the third quarter 2009. The remaining cleaning of the high grade building is scheduled for the fourth quarter 2009.

Truck Scale

The cleaning of the truck scale is scheduled for the fourth quarter 2009.

Locomotive Crane Shed

The cleaning of the locomotive crane shed is complete. On September 22, 2009, Asarco submitted the completion notification letter to the Department.

Cement and Dust Silos

The cleaning of the cement and dust silos is complete. Asarco will submit a notification letter to the Department during the fourth quarter 2009.

Soda Ash and Lime Silo and Coke Hopper

The cleaning of the soda ash and lime silo and coke hopper is scheduled for the fourth quarter 2009.

Pump House

The cleaning of the pump house commenced during the third quarter 2009. The remaining cleaning of the pump house is scheduled for the fourth quarter 2009.

Storm Water Sump

The cleaning of the storm water sump is scheduled for the fourth quarter 2009.

Direct Smelt Building

The cleaning of the direct smelt building was completed during the third quarter 2009. On August 28, 2009, Asarco submitted the completion notification letter to the Department.

Coverall Buildings

The cleaning of the coverall buildings commenced in the second quarter 2009. The remaining cleaning of the coverall buildings is scheduled for the fourth quarter 2009.

Adobe Shed

The cleaning of the adobe shed was completed during the third quarter 2009. On September 15, 2009, Asarco submitted the completion notification letter to the Department.

Utility Support Towers

The cleaning of the utility support towers is scheduled for the fourth quarter 2009.

Concentrate Storage and Handling Building

The cleaning of the concentrate storage and handling building commenced in the third quarter 2009. The remaining cleaning of the concentrate storage and handling building is scheduled for the fourth quarter 2009.

BUILDINGS AND STRUCTURES SCHEDULED FOR CLEANING PRIOR TO DEMOLITION

Sample Mill and Dust Loadout Baghouses

The cleaning of the sample mill and dust loadout baghouses was completed during the third quarter 2009. On September 30, 2009, Asarco submitted the completion notification letter to the Department.

Crushing Mill Baghouses

The cleaning of the crushing mill baghouses was completed during the third quarter 2009. On September 30, 2009, Asarco submitted the completion notification letter to the Department.

Sinter Stocking Building Baghouse

The cleaning of the sinter stocking building baghouse was completed during the third quarter 2009. Asarco will submit a notification letter to the Department during the fourth quarter 2009.

Concentrate Storage and Handling Building Baghouses, Ventilation Ductwork, and Stack Base

The cleaning of the concentrate storage and handling building baghouses, ventilation ductwork and stack base was completed during the third quarter 2009.

On September 30, 2009, Asarco submitted the completion notification letter to the Department.

Hopto Pad, Storage Bins, and Conveyor Gallery

The cleaning of the hopto pad, storage bins, and conveyor gallery was completed during the third quarter 2009. On September 28, 2009, Asarco submitted the completion notification letter to the Department.

Acid Dust Facility

The cleaning of the acid dust facility was completed during the third quarter 2009. On September 25, 2009, Asarco submitted the completion notification letter to the Department.

Groundwater Sump

The cleaning of the groundwater sump was completed during the third quarter 2009. Asarco will submit a notification letter to the Department during the fourth quarter 2009.

BUILDINGS AND STRUCTURES SCHEDULED FOR DEMOLITION

Sample Mill

The demolition of the sample mill was completed during the third quarter 2009. On September 30, 2009, Asarco submitted the completion notification letter to the Department.

Crushing Mill

The demolition of the crushing mill was completed during the third quarter 2009. On September 30, 2009, Asarco submitted the completion notification letter to the Department.

Hopto Pad, Storage Bins, and Conveyor Gallery

The demolition of the hopto pad, storage bins, and conveyor gallery was completed during the third quarter 2009. On September 28, 2009, Asarco submitted the completion notification letter to the Department.

Acid Dust Facility

The demolition of the acid dust facility was completed during the third quarter 2009. On September 25, 2009, Asarco submitted the completion notification letter to the Department.

Sinter Stocking Building

The demolition of the sinter stocking building baghouse was completed during the third quarter 2009. Asarco will submit a notification letter to the Department during the fourth quarter 2009.

Abandoned and New Breaking Floor Buildings

The demolition of the abandoned and new breaking floor buildings was completed during the third quarter 2009. Asarco will submit a notification letter to the Department during the fourth quarter 2009.

Groundwater Sump

The demolition of the groundwater sump was completed during the third quarter 2009. Asarco will submit a notification letter to the Department during the fourth quarter 2009.

Concentrate Storage and Handling Building Ventilation System and Stack

The demolition of the concentrate storage and handling building ventilation system and stack was completed during the third quarter 2009. On September 30, 2009, Asarco submitted the completion notification letter to the Department.

Sinter Plant, Acid Plant, and Blast Furnace Stacks

The demolition of the sinter plant, acid plant, and blast furnace stack took place on August 14, 2009. On September 25, 2009, Asarco submitted the completion notification letter to the Department.

Miscellaneous Railroad Ties

The miscellaneous railroad ties were hauled to the CAMU Phase 2 cell during the third quarter 2009. On September 28, 2009, Asarco submitted the completion notification letter to the Department.

Asarco provided the State Historic Preservation Office with a script for the demolition video.

All prescribed exposed surface soil areas within the demolition footprint have been sampled.

With the exception of one plant water line near the sample mill, all of the prescribed abandoned underground utilities have been flow filled.

With the exception of certain areas within the crushing mill area, most prescribed demolition footprint have been backfilled with fumed slag. These backfilled areas have been or will soon be rolled to achieve proper drainage prior to the placement of the interim caps.

b. Summaries of all deviations from the approved Work Plan during the reporting period;

Asarco proposed cleaning and placing a temporary liner in the former coke storage area to minimize storm water infiltration. The cleaning of the area and placement of the liner was not a component of the approved 2009 Work Plan and will result in increased costs. EPA approved Asarco's proposal and granted credit

for this work under the custodial trust. There were no other deviations from the approved Work Plan during the reporting period.

c. Summaries of all problems or potential problems encountered during the reporting period;

During the cleaning of the concentrate storage and handling building, Asarco determined that the cleaning of the feeder grates in their present location posed a safety hazard. In consultation with Asarco, EPA, Hydrometrics, and the Department, approval to remove the feeder grates using an overhead crane was granted. The cleaning of the feeder grates minimized the safety hazard and accelerated the cleaning process.

The height of the large concentrate storage and handling building (CSHB) bin walls has presented challenges to completing the required cleaning. The removal of CSHB center bin walls and breaching of bin wall bases took place to gain the necessary access.

Many of the tasks originally assigned to Express Service personnel have been transferred to URS/CWC personnel. The transfer was necessary to address long-term operation of the on-site water treatment facility.

d. Projected work for the next reporting period;

The remaining, unfinished tasks set forth in the Work Plan will be completed during the fourth quarter 2009. Weekly progress meeting will continue to take place every Wednesday to review the progress of the project. URS/CWC and their subcontractors will continue with the cleaning and demolition set forth in the Work Plan. ARCADIS will continue with the recordation program.

e. Documentation of all shipments of recyclable materials and hazardous wastes off-site including shipping papers such as manifests (if required);

Scrap Metal

There were 155 shipments of recyclable materials (unprepared scrap steel) that were shipped during the third quarter 2009. A copy of the scrap metal daily summary report for these shipments is attached to this quarterly progress report.

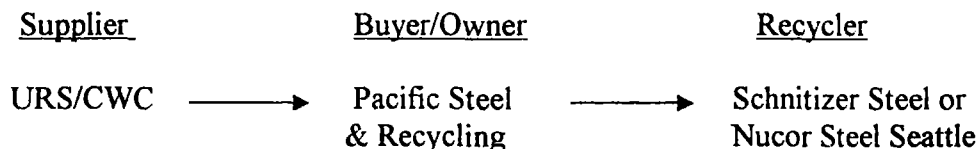
There were no off-site shipments of hazardous wastes associated with the 2009 Work Plans during the third quarter 2009. The waste material generated during the cleaning and demolition project was hauled directly to the CAMU Phase 2 cell. The following materials were hauled to the CAMU Phase 2 cell during the third quarter 2009.

Description of Material	Amount (Tons)
200 Foot Acid Tail Gas Stack	1912
400 Foot Sinter Stack	7205
425 Foot Blast Furnace Baghouse Stack	3652
Breaking Floor/Highline Area	1066
Crushing Mill Area	2813
Direct Smelt Building Cleaning Debris	827
Hopto Pad Area	3479
CSHB Cleaning Material	907
CHSB Wall Demolition Material	695
Sample Mill Area	5262
Railroad Ties Material	163
Acid Dust Facility	14
Total	27,996

- f. **Description of each shipment of reclaimed or recycled material made during the preceding quarter indicating how the material is managed, handled, or treated for recovery or recycling that demonstrates that it has value. The information to be submitted to the Department in making a successful stewardship demonstration is (1) acceptance criteria required by the receiving facility (expressed as a minimum threshold of recoverable metals and maximum allowable toxic metals), (2) a demonstration that the receiving facility is in compliance with all applicable environmental requirements, (3) a copy of the contractual agreement between Asarco, its broker and the receiving facility, (4) the name of the state or provincial regulatory contact and facility contact.**

Scrap Steel

The recoverable scrap steel that has been generated as part of the 2008 Work Plans was managed in accordance with the following procedures.



1. URS/CWC acquired ownership of all recoverable scrap metal that was generated under the 2009 Work Plan. URS/CWC contracted with Pacific Steel & Recycling to haul and recycle the scrap steel. URS/CWC loaded the unprepared scrap steel (defined as material that is cut into lengths that will fit into roll-off containers and side dump trucks) into roll-off containers and side dump trucks for transport to the Pacific Steel & Recycling facility located in Helena, Montana. Pacific Steel & Recycling will export prepared steel

(defined as material that is cut into lengths specified by the receiving mill) to the two scrap metal recycling facilities described above. The processed scrap steel will be re-used in other steel products.

2. A September 26, 2007 letter from Mike Kempel (Pacific Steel and Recycling) states that the two mills listed above comply with all federal requirements for processing scrap metal. A copy of the September 26, 2007 letter is attached to this quarterly progress report.
3. A copy of the contract pricing letter between Pacific Steel and Recycling and URS/CWC is attached to this quarterly progress report.
4. The name of the state or provincial regulatory contact and facility contact for the scrap steel are:

(For Pacific Steel & Recycling)
Rick Thompson
Montana Department of Environmental Quality
Section Supervisor
Solid Waste and Recycling
Helena, Montana 59620
(406) 444-5345

(For Schnitzer Steel)
Jane Hickman
Oregon Department of Environmental Quality
Manager
Solid Waste and Recycling
Portland, Oregon 97203
(503) 710-5555

(For Nucor Steel Seattle, Inc.)
Elliot Zimmermann
Washington Department of Ecology
3190 160th Avenue, SE
Bellevue, Washington 98008-5452
(425) 649-7072

(For Pacific Steel & Recycling)
Eric Meredith
Branch Manager
Pacific Steel and Recycling
1530 National Avenue
P. O. Box 4226
Helena, Montana 59604-4226
Telephone (406) 442-7851

(For Schnitizer Steel)
Bill Whiten
Schnitizer Steel
Manager
12005 North Burgard Road
Portland, Oregon 97203
(503) 710-1559

(For Nucor Steel Seattle, Inc.)
Bart Kale
Environmental Manager
Nucor Steel Seattle, Inc.
2424 SW Andover Street
Seattle, Washington 98106-1100
(604) 324-4656

If you should need any further explanation or assistance with the information contained in this quarterly progress report, please feel free to contact me.

Sincerely,



Jon Nickel

Attachment

cc: Iver Johnson
Linda Jacobson

**EAST HELENA SITE
QUARTERLY PROGRESS REPORT
JULY 2009 - SEPTEMBER 2009**

SCRAP METAL DAILY SUMMARY REPORT

ASARCO E Helena Mt.

Gross Tons Delivered To Date: 674.3

Total Loads Hauled To Date: 155

- Mill total GT

Total Credit to CWC Job # 29007

4.35 Tons per Load

No.	DATE	TYPE OF MATERIAL	TRUCK ID #	License #	CWC Ticket#	Vendor Scrap Ticket	TARE WEIGHT (LBS)	GROSS WEIGHT (LBS)	NET WEIGHT (LBS)	NET WEIGHT (GT)	Mill Wt. (GT)	GT RUNNING TOTAL (CWC Scale)	CWC Unit Price
1	7/23/09	NO.1 RR Rail		Mt742943	DA046145		34,700.0	52,920.0	18,220	8.13	-	8.1	
2	7/24/09	NO.1 RR Rail		Mt742943	DA046146		30,020.0	61,260.0	31,240	13.95		22.1	
3	7/27/09	mixed unprep		Mt742943	3101		35,060.0	44,000.0	8,940	3.99		26.1	
4	7/27/09	mixed unprep		Mt742943	3102		34,460.0	43,840.0	9,380	4.19		30.3	
5	7/28/09	mixed unprep		MACK MT	3103		34,740.0	49,660.0	14,920	6.66		36.9	
6	7/28/09	mixed unprep		MACK MT	3104		35,120.0	45,420.0	10,300	4.60		41.5	
7	7/29/09	mixed unprep		MACK MT	3105		34,680.0	43,520.0	8,840	3.95		45.5	
8	7/29/09	mixed unprep		MACK MT	3106		34,880.0	44,040.0	9,160	4.09		49.6	
9	7/29/09	mixed unprep		MACK MT	3107		34,440.0	46,140.0	11,700	5.22		54.8	
10	7/29/09	mixed unprep		MACK MT	3108		34,440.0	45,960.0	11,520	5.14		59.9	
11	7/29/09	mixed unprep		MACK MT	3109		34,880.0	45,840.0	10,960	4.89		64.8	
12	7/30/09	mixed unprep		Black/Orange	3110		38,660.0	47,220.0	8,560	3.82		68.6	
13	7/30/09	mixed unprep		Blk/end dump	3111		34,100.0	45,100.0	11,000	4.91		73.5	
14	7/30/09	mixed unprep		Red/Sd dump	3112		40,460.0	48,560.0	8,100	3.62		77.2	
15	7/30/09	mixed unprep		MACK MT	3113		35,000.0	42,680.0	7,680	3.43		80.6	
16	7/30/09	mixed unprep		Black/Orange	3114		38,240.0	49,520.0	11,280	5.04		85.6	
17	7/30/09	mixed unprep		MACK MT	3115		34,500.0	43,060.0	8,560	3.82		89.4	
18	7/30/09	mixed unprep		Red/Sd dump	3116		40,460	48,320	7,860	3.51		93.0	
19	7/30/09	mixed unprep		MACK MT	3117		34,900	49,800	14,900	6.65		99.6	
20	7/30/09	mixed unprep		MACK MT	3118		34,540	42,220	7,680	3.43		103.0	
21	7/30/09	mixed unprep		Red/Sd dump	3119		38,680	45,220	6,540	2.92		106.0	
22	7/30/09	mixed unprep		MACK MT	3120		34,940	45,400	10,460	4.67		110.6	
23	7/30/09	mixed unprep		Red/Sd dump	3121		40,340	47,940	7,600	3.39		114.0	
24	7/30/09	mixed unprep		MACK MT	3122		34,940	43,240	8,300	3.71		117.7	
25	7/31/09	mixed unprep		MACK MT	3123		34,480	43,620	9,140	4.08		121.8	
26	7/31/09	mixed unprep		Black/Orange	3124		38,900	45,280	6,380	2.85		124.7	
27	7/31/09	mixed unprep		MACK MT	3125		34,320	42,220	7,900	3.53		128.2	
28	7/31/09	mixed unprep		Black/Orange	3126		38,640	46,580	7,940	3.54		131.7	
29	7/31/09	mixed unprep		Black/Orange	3127		38,700	46,360	7,660	3.42		135.1	
30	7/31/09	mixed unprep		Red/Sd dump	3128		40,400	47,760	7,360	3.29		138.4	
31	7/31/09	mixed unprep		MACK MT	3129		34,360	40,960	6,600	2.95		141.4	
32	7/31/09	mixed unprep		Black/Orange	3130		38,700	45,040	6,340	2.83		144.2	
33	7/31/09	mixed unprep		MACK MT	3131		34,960	40,700	5,740	2.56		146.8	
34	7/31/09	mixed unprep		Red/Sd dump	3132		40,460	47,380	6,920	3.09		149.9	
35	7/31/09	mixed unprep		Black/Orange	3133		34,360	42,000	7,640	3.41		153.3	
36	7/31/09	mixed unprep		Red/Sd dump	3134		40,500	46,700	6,200	2.77		156.0	
37	8/3/09	mixed unprep		MACK MT	3135		34,860	39,720	4,860	2.17		158.2	
38	8/3/09	mixed unprep		MACK MT	3136		34,700	40,560	5,860	2.62		160.8	
39	8/3/09	mixed unprep		MACK MT	3137		34,840	41,460	6,620	2.96		163.8	
40	8/3/09	mixed unprep		MACK MT	3138		34,900	41,660	6,760	3.02		166.8	
41	8/3/09	mixed unprep		Black/Orange	3139		40,680	48,460	7,780	3.47		170.3	
42	8/3/09	mixed unprep		MACK MT	3140		34,420	41,220	6,800	3.04		173.3	
43	8/3/09	mixed unprep		Black/Orange	3141		40,440	47,800	7,360	3.29		176.6	
44	8/3/09	mixed unprep		MACK MT	3142		34,920	40,300	5,380	2.40		179.0	
45	8/4/09	Tin Material		MACK MT	3143		34,760	39,520	4,760	2.13		181.1	
46	8/4/09	mixed unprep		Black/Orange	3144		40,220	49,620	9,400	4.20		185.3	
47	8/4/09	mixed unprep		MACK MT	3145		34,560	43,700	9,140	4.08		189.4	
48	8/4/09	mixed unprep		Black/Orange	3146		40,040	48,320	8,280	3.70		193.1	
49	8/4/09	mixed unprep		MACK MT	3147		34,820	44,420	9,600	4.29		197.4	

ASARCO E Helena Mt.

No.	DATE	TYPE OF MATERIAL	TRUCK ID #	License #	CWC Ticket#	Vendor Scrap Ticket	TARE WEIGHT (LBS)	GROSS WEIGHT (LBS)	NET WEIGHT (LBS)	NET WEIGHT (GT)	Mill Wt. (GT)	GT RUNNING TOTAL (CWC Scale)	CWC Unit Price
50	8/20/09	mixed unprep		MACK MT	3148		34,580	49,440	14,860	6.63		204.0	
51	8/20/09	mixed unprep		MACK MT	3149		34,820	50,140	15,320	6.84		210.8	
52	8/20/09	mixed unprep		MACK MT	3150		34,560	52,380	17,820	7.96		218.8	
53	8/20/09	mixed unprep		MACK MT	3151		34,720	50,440	15,720	7.02		225.8	
54	9/20/09	mixed unprep		MACK MT	3152		34,520	48,960	14,440	6.45		232.3	
55	8/20/09	mixed unprep		MACK MT	3153		34,700	49,360	14,660	6.54		238.8	
56	8/20/09	mixed unprep		MACK MT	3154		34,480	52,720	18,240	8.14		247.0	
57	8/24/09	mixed unprep		MACK MT	3155		34,620	42,500	7,880	3.52		250.5	
58	8/24/09	mixed unprep		MACK MT	3156		39,520	43,700	4,180	1.87		252.3	
59	8/24/09	mixed unprep		MACK MT	3157		35,020	49,640	14,620	6.53		258.9	
60	8/24/09	mixed unprep		MACK MT	3158		34,860	50,640	15,780	7.04		265.9	
61	8/24/09	mixed unprep		MACK MT	3159		34,900	51,520	16,620	7.42		273.3	
62	8/24/09	mixed unprep		MACK MT	3160		34,880	46,440	11,560	5.16		278.5	
63	8/24/09	mixed unprep		MACK MT	3161		35,200	47,640	12,440	5.55		284.0	
64	8/24/09	mixed unprep		Red/Black	3162		40,120	54,660	14,540	6.49		290.5	
65	8/24/09	mixed unprep		MACK MT	3163		35,180	50,640	15,460	6.90		297.4	
66	8/24/09	mixed unprep		Red/Black	3164		40,060	56,540	16,480	7.36		304.8	
67	8/25/09	mixed unprep		MACK MT	3165		35,000	48,800	13,800	6.16		311.0	
68	8/25/09	mixed unprep		MACK MT	3166		35,180	47,880	12,700	5.67		316.6	
69	8/25/09	mixed unprep		Red/Black	3167		39,380	52,520	13,140	5.87		322.5	
70	8/25/09	mixed unprep		Red/Black	3168		39,580	48,620	9,040	4.04		326.5	
71	8/25/09	mixed unprep		MACK MT	3169		34,680	46,560	11,880	5.30		331.8	
72	8/25/09	mixed unprep		MACK MT	3170		34,640	45,060	10,420	4.65		336.5	
73	8/25/09	mixed unprep		MACK MT	3171		34,640	47,180	12,540	5.60		342.1	
74	8/26/09	mixed unprep		MACK MT	3172		34,680	48,260	13,580	6.06		348.1	
75	8/26/09	mixed unprep		MACK MT	3173		34,940	41,320	6,380	2.85		351.0	
76	8/26/09	mixed unprep		MACK MT	3174		34,920	47,200	12,280	5.48		356.5	
77	8/26/09	mixed unprep		MACK MT	3175		34,920	44,620	9,700	4.33		360.8	
78	8/26/09	mixed unprep		MACK MT	3176		34,780	49,120	14,340	6.40		367.2	
79	8/27/09	mixed unprep		MACK MT	3177		34,840	45,520	10,680	4.77		372.0	
80	8/27/09	mixed unprep		Red/Black	3178		39,800	50,920	11,120	4.96		376.9	
81	8/27/09	mixed unprep		MACK MT	3179		34,960	45,600	10,640	4.75		381.7	
82	8/27/09	mixed unprep		MACK MT	3180		34,920	46,680	11,760	5.25		386.9	
83	8/31/09	mixed unprep		MACK MT	3181		34,640	49,440	14,800	6.61		393.5	
84	8/31/09	mixed unprep		MACK MT	3182		34,480	47,460	12,980	5.79		399.3	
85	9/1/09	mixed unprep		MACK MT	3183		34,860	51,940	17,080	7.63		407.0	
86	9/1/09	mixed unprep		Red/Black	3184		45,280	61,060	15,780	7.04		414.0	
87	9/1/09	mixed unprep		Red/Black	3185		45,760	65,320	19,560	8.73		422.7	
88	9/2/09	mixed unprep		Red/Black	3186		41,820	51,360	9,540	4.26		427.0	
89	9/2/09	mixed unprep		Red/Black	3187		42,160	55,000	12,840	5.73		432.7	
90	9/2/09	mixed unprep		Red/Black	3188		42,100	50,920	8,820	3.94		436.7	
91	9/2/09	mixed unprep		Red/Black	3189		42,140	49,640	7,500	3.35		440.0	
92	9/2/09	Copper# 2		Red/Black	3189		49,640	50,900	1,260	0.56		440.6	
93	9/11/09	mixed unprep		Red/Black	3190		39,320	46,940	7,620	3.40		444.0	
94	9/11/09	mixed unprep		MACK MT	3191		34,820	40,380	5,560	2.48		446.5	
95	9/11/09	mixed unprep		MACK MT	3192		34,680	41,620	6,940	3.10		449.6	
96	9/11/09	mixed unprep		Red/Black	3193		39,420	45,720	6,300	2.81		452.4	
97	9/11/09	mixed unprep		Red/Black	3194		39,500	47,100	7,600	3.39		455.8	
98	9/11/09	mixed unprep		Red/Black	3195		39,420	47,980	8,560	3.82		459.6	
99	9/11/09	mixed unprep		MACK MT	3196		34,760	42,320	7,560	3.38		463.0	
100	9/14/09	mixed unprep		MACK MT	3197		34,780	40,120	5,340	2.38		465.3	
101	9/14/09	mixed unprep		MACK MT	3198		34,740	42,820	8,080	3.61		469.0	

ASARCO E Helena Mt.

No.	DATE	TYPE OF MATERIAL	TRUCK ID #	License #	CWC Ticket#	Vendor Scrap Ticket	TARE WEIGHT (LBS)	GROSS WEIGHT (LBS)	NET WEIGHT (LBS)	NET WEIGHT (GT)	Mill Wt. (GT)	GT RUNNING TOTAL (CWC Scale)	CWC Unit Price
102	9/14/09	mixed unprep		MACK MT	3199		34,680	45,300	10,620	4.74		473.7	
103	9/14/09	mixed unprep		MACK MT	3200		34,480	42,880	8,400	3.75		477.4	
104	9/15/09	mixed unprep		MACK MT	3201		34,620	42,660	8,040	3.59		481.0	
105	9/15/09	mixed unprep		MACK MT	3202		34,880	44,800	9,920	4.43		485.5	
106	9/15/09	mixed unprep		MACK MT	3203		34,720	43,320	8,600	3.84		489.3	
107	9/15/09	mixed unprep		Red/Black	3204		41,400	50,400	9,000	4.02		493.3	
108	9/15/09	mixed unprep		MACK MT	3205		34,800	42,940	8,140	3.63		497.0	
109	9/15/09	mixed unprep		Red/Black	3206		41,440	47,140	5,700	2.54		499.5	
110	9/15/09	mixed unprep		Red/Black	3207		43,480	53,380	9,900	4.42		503.9	
111	9/16/09	mixed unprep		MACK MT	3208		34,740	45,060	10,320	4.61		508.5	
112	9/16/09	mixed unprep		MACK MT	3209		34,380	44,500	10,120	4.52		513.0	
113	9/16/09	mixed unprep		MACK MT	3210		34,720	40,400	5,680	2.54		515.6	
114	9/16/09	mixed unprep		MACK MT	3211		34,780	43,200	8,420	3.76		519.3	
115	9/16/09	mixed unprep		MACK MT	3212		34,740	42,480	7,740	3.46		522.8	
116	9/16/09	mixed unprep		Red/Black	3213		36,360	45,560	9,200	4.11		526.9	
117	9/17/09	mixed unprep		MACK MT	3214		34,540	45,500	10,960	4.89		531.8	
118	9/17/09	mixed unprep		MACK MT	3215		34,700	45,860	11,160	4.98		536.8	
119	9/17/09	mixed unprep		Red/Black	3216		36,440	49,380	12,940	5.78		542.6	
120	9/17/09	mixed unprep		Red/Black	3217		36,680	50,180	13,500	6.03		548.6	
121	9/17/09	mixed unprep		Red/Black	3218		36,680	50,800	14,120	6.30		554.9	
122	9/17/09	mixed unprep		MACK MT	3219		34,860	44,980	10,120	4.52		559.4	
123	9/17/09	mixed unprep		Red/Black	3220		36,980	47,780	10,800	4.82		564.2	
124	9/17/09	mixed unprep		Red/Black	3221		36,860	47,920	11,060	4.94		569.2	
125	9/17/09	mixed unprep		Red/Black	3222		37,200	47,240	10,040	4.48		573.6	
126	9/17/09	mixed unprep		MACK MT	3223		34,720	45,460	10,740	4.79		578.4	
127	9/18/09	mixed unprep		MACK MT	3224		34,700	41,160	6,460	2.88		581.3	
128	9/18/09	mixed unprep		MACK MT	3225		34,920	40,440	5,520	2.46		583.8	
129	9/18/09	mixed unprep		Red/Black	3226		37,300	48,080	10,780	4.81		588.6	
130	9/18/09	mixed unprep		MACK MT	3227		34,900	41,240	6,340	2.83		591.4	
131	9/18/09	mixed unprep		MACK MT	3228		34,840	40,800	5,960	2.66		594.1	
132	9/18/09	mixed unprep		MACK MT	3229		34,600	43,000	8,400	3.75		597.8	
133	9/18/09	mixed unprep		Red/Black	3230		39,640	45,860	6,220	2.78		600.6	
134	9/18/09	mixed unprep		MACK MT	3231		34,300	39,600	5,300	2.37		603.0	
135	9/18/09	mixed unprep		MACK MT	3233		34,520	42,140	7,620	3.40		606.4	
136	9/21/09	mixed unprep		MACK MT	3233		34,460	42,480	8,020	3.58		610.0	
137	9/22/09	mixed unprep		MACK MT	3234		34,780	41,900	7,120	3.18		613.1	
138	9/22/09	mixed unprep		MACK MT	3235		34,700	44,520	9,820	4.38		617.5	
139	9/23/09	mixed unprep		MACK MT	3236		34,280	41,700	7,420	3.31		620.8	
140	9/23/09	mixed unprep		MACK MT	3237		34,300	39,880	5,580	2.49		623.3	
141	9/23/09	mixed unprep		MACK MT	3238		34,640	42,920	8,280	3.70		627.0	
142	9/23/09	mixed unprep		MACK MT	3239		34,240	42,980	8,740	3.90		630.9	
143	9/23/09	mixed unprep		MACK MT	3240		34,800	42,880	8,080	3.61		634.5	
144	9/24/09	mixed unprep		MACK MT	3241		34,720	41,180	6,460	2.88		637.4	
145	9/24/09	mixed unprep		Red/Black	3242		39,700	46,580	6,880	3.07		640.5	
146	9/24/09	mixed unprep		Red/Black	3243		39,240	45,920	6,680	2.98		643.5	
147	9/24/09	mixed unprep		Red/Black	3244		38,980	45,660	6,680	2.98		646.5	
148	9/24/09	mixed unprep		Red/Black	3245		39,040	46,880	7,840	3.50		650.0	
149	9/24/09	mixed unprep		MACK MT	3246		34,880	43,140	8,260	3.69		653.6	
150	9/24/09	mixed unprep		MACK MT	3247		34,620	42,120	7,500	3.35		657.0	
151	9/24/09	mixed unprep		MACK MT	3248		34,620	42,180	7,560	3.38		660.4	
152	9/25/09	mixed unprep		Red/Black	3249		39,440	49,360	9,920	4.43		664.8	
153	9/25/09	mixed unprep		Red/Black	3250		40,140	46,000	5,860	2.62		667.4	

No.	DATE	TYPE OF MATERIAL	TRUCK ID #	License #	CWC Ticket#	Vendor Scrap Ticket	TARE WEIGHT (LBS)	GROSS WEIGHT (LBS)	NET WEIGHT (LBS)	NET WEIGHT (GT)	Mill Wt. (GT)	GT RUNNING TOTAL (CWC Scale)	CWC Unit Price
154	9/28/09	mixed unprep		Red/Black	3251		39,600	47,600	8,000	3.57		671.0	
155	9/28/09	mixed unprep		Red/Black	3252		39,540	46,860	7,320	3.27		674.3	
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205									-	-		674.3	

**EAST HELENA SITE
QUARTERLY PROGRESS REPORT
JULY 2009 - SEPTEMBER 2009**

SEPTEMBER 26, 2007 PACIFIC STEEL AND RECYCLING LETTER



PACIFIC
STEEL & RECYCLING..

September 26, 2007

Randy Cook
Cleveland Wrecking
628 E. Edna Place
Covina CA 91723

Dear Randy:

The following mill will export the material Pacific is shipping from your job in Helena, Montana:

Schnitizer Steel
12005 North Burgard Road
Portland OR 97203

The following mill will melt down the material Pacific is shipping from your job in Helena, Montana. The melted down scrap material will then be re-used in other steel products.

Nucor
2424 SW Andover
Seattle WA 98106

Both mills comply with all federal requirements for processing scrap metal.

Sincerely,

Mike Kempel
Branch Manager

**EAST HELENA SITE
QUARTERLY PROGRESS REPORT
JULY 2009 - SEPTEMBER 2009**

CONTRACT PRICING LETTER



PACIFIC
STEEL & RECYCLING

Shaun O'Connor
URS Corporation,
Randy Cook
Cleveland Wrecking Co.

The Scrap Iron price is based on a percentage of the "Iron Age Scrap Price Bulletin" Composite Price. Scrap No. 1 hvy. converted from gross ton to net ton (gross ton divided by 1.12 = net ton). We will use the first publication of the month, and follow it on a monthly basis.

September 2007 Scrap price for the ASARCO plant in Helena MT. Composite price is [REDACTED] gross ton divided by 1.12 = [REDACTED] net ton.

Prepared Scrap Iron (loaded into our roll off container on site) Composite net minus [REDACTED] = [REDACTED] / net ton

Unprepared (loaded into our roll off container on site) Composite net minus [REDACTED] = [REDACTED] / net ton

Tin siding/roofing (loose in a pile, we will provide a tin baler and trucking)
Composite net minus [REDACTED] = [REDACTED] / net ton

Thank you,


Mike